

~~SECRET~~

unsealed 3/13/08 per order  
ajv

03/07/08 12:58

Encl

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury, 08 CR 0682 — JLS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARISELA CASTRO-JUAREZ (1),  
MARISA MELENA MAFNAS (2),  
DAVID MONTES (3),  
JULIE HERNANDEZ (4),  
RANDAL MARK PANTER (5),  
LORENZO PECORARO (6),  
JOSE PARADA-VELAZQUEZ (7),  
JOHN WALTER SCHUH (8),

Defendants.

Criminal Case No. \_\_\_\_\_

I N D I C T M E N T

Title 18, U.S.C., Sec. 371;  
Title 8, U.S.C.,  
Sec. 1324(a)(2)(B)(ii) -  
Conspiracy to Bring in Illegal  
Aliens for Financial Gain;  
Title 8, U.S.C.,  
Secs. 1324(a)(1)(A)(ii) and  
(v)(I) - Conspiracy to Transport  
Illegal Aliens; Title 8, U.S.C.,  
Sec. 1324(a)(2)(B)(ii) -  
Bringing in Illegal Aliens for  
Financial Gain; Title 8, U.S.C.,  
Sec. 1324(a)(1)(A)(ii) and  
(v)(II) - Transportation of  
Illegal Aliens and Aiding and  
Abetting; Title 18, U.S.C.,  
Sec. 1957 - Engaging in Monetary  
Transactions in Property Derived  
from Unlawful Activity; Title 18,  
U.S.C., Sec. 1956(a)(1)(B)(ii) -  
Laundering of Monetary  
Instruments; Title 18, U.S.C.,  
Sec. 2 - Aiding and Abetting;  
Title 18, U.S.C., Sec. 982 -  
Criminal Forfeiture

SFM:nlv(1):San Diego  
3/7/08

ajv

1 The grand jury charges:

2 Count 1

3 Beginning at a date unknown to the grand jury and continuing up  
4 to and including August 1, 2007, within the Southern District of  
5 California, and elsewhere, defendants MARISELA CASTRO-JUAREZ, MARISA  
6 MELENA MAFNAS, DAVID MONTES, JULIE HERNANDEZ, RANDAL MARK PANTER,  
7 LORENZO PECORARO, JOSE PARADA-VELAZQUEZ, and JOHN WALTER SCHUH, with  
8 the intent to violate the immigration laws of the United States, did  
9 knowingly and intentionally conspire together and with each other and  
10 with other persons known and unknown to the grand jury, to commit  
11 offenses against the United States, namely:

12 OBJECTS OF THE CONSPIRACY

13 1. To bring to the United States, aliens, knowing that the  
14 persons were aliens, at a place other than a designated port of entry,  
15 and at a place other than designated by the Commissioner of the  
16 Immigration and Naturalization Service, with the intent to violate the  
17 immigration laws of the United States, in violation of Title 8, United  
18 States Code, Section 1324(a)(1)(A)(i).

19 2. To bring illegal aliens into the United States for the  
20 purpose of commercial advantage and private financial gain; in  
21 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

22 3. To transport and move illegal aliens within the United  
23 States, knowing that such aliens had come to, entered, and remained  
24 in the United States in violation of law, and with the intent to  
25 violate the immigration laws of the United States, in violation of  
26 Title 8, United States Code, Section 1324(a)(1)(A)(ii).

27 4. To conceal, harbor, and shield from detection, illegal  
28 aliens, knowing that such aliens had come to, entered, and remained

1 in the United States in violation of law, and with the intent to  
2 violate the immigration laws of the United States, in violation of  
3 Title 8, United States Code, Section 1324(a)(1)(A)(iii).

4 OVERT ACTS

5 In furtherance of said conspiracy and to effect and accomplish  
6 the objects thereof, the following overt acts, among others, were  
7 committed within the Southern District of California, and elsewhere:

- 8 1. On or about October 24, 2001, defendant MARISELA CASTRO-  
9 JUAREZ drove a Saturn station wagon from Mexico into the  
10 United States at the San Ysidro, California, Port of Entry  
11 carrying an undocumented alien concealed in a modified  
12 dashboard compartment.
- 13 2. On or about June 13, 2002, defendant JOHN WALTER SCHUH  
14 drove a Dodge Minivan that was registered to defendant  
15 MARISA MELENA MAFNAS to an area approximately 9 miles east  
16 of the Tecate, California, Port of Entry carrying eight  
17 undocumented aliens concealed in the trunk.
- 18 3. On or about March 20, 2002, defendant MARISELA CASTRO-  
19 JUAREZ drove a Volkswagon Jetta on State Route 94 near  
20 Potrero, California, and placed a phone call to Jeri  
21 Stephenson (not charged herein) instructing Stephenson to  
22 "just drive eastbound" in a 2002 Dodge Caravan that  
23 contained four undocumented aliens.
- 24 4. On or about January 9, 2004, defendant LORENZO PECORARO  
25 rode as a passenger in a Ford Probe driven from Mexico into  
26 the United States at the Otay Mesa, California, Port of  
27 Entry carrying one undocumented alien concealed in a  
28 modified dashboard compartment.

- 1           5.    On or about March 25, 2004, defendant JOHN WALTER SCHUH  
2               drove a Dodge Avenger from Mexico into the United States at  
3               the San Ysidro, California, Port of Entry carrying three  
4               undocumented aliens concealed in the trunk.
- 5           6.    On or about May 7, 2004, defendant LORENZO PECORARO drove  
6               a BMW 325 from Mexico into the United States at the San  
7               Ysidro, California, Port of Entry carrying three  
8               undocumented aliens concealed in the trunk of the vehicle.
- 9           7.    On or about November 30, 2004, defendant MARISELA CASTRO-  
10            JUAREZ drove a blue Volvo from Mexico into the United  
11            States through the San Ysidro, California, Port of Entry,  
12            picked up Juan Apolinar-Juarez (charged elsewhere) and  
13            drove to a Burger King restaurant at the intersection of  
14            Dairy Mart Road and West San Ysidro Boulevard, where  
15            Apolinar-Juarez got out of the Volvo, walked over to a  
16            nearby hotel, and got into the passenger side of a white  
17            Pontiac occupied by Antolin Elias (charged elsewhere) and  
18            three undocumented aliens in the back seat.
- 19          8.    On or about September 14, 2005, defendant MARISA MELENA  
20            MAFNAS drove a Mazda MX-6 from Mexico into the United  
21            States at the San Ysidro, California, Port of Entry  
22            carrying one undocumented alien concealed in a modified  
23            dashboard compartment.
- 24          9.    On or about September 16, 2005, Yesenia Garcia-Reyna  
25            (charged elsewhere) drove a Volkswagon Beetle from Mexico  
26            into the United States at the San Ysidro, California, Port  
27            of Entry carrying three undocumented aliens in the  
28            passenger compartment.

- 1        10. On or about October 3, 2005, Yesenia Garcia-Reyna drove a  
2        Hyundai Elantra from Mexico into the United States at the  
3        San Ysidro, California, Port of Entry carrying one  
4        undocumented alien in the passenger compartment.
- 5        11. On or about October 5, 2005, Yesenia Garcia-Reyna drove a  
6        Hyundai 300CD from Mexico into the United States at the  
7        San Ysidro, California, Port of Entry carrying one  
8        undocumented alien in the passenger compartment.
- 9        12. On or about November 6, 2005, defendant JOHN WALTER SCHUH  
10       drove a Chevrolet Impala from Mexico into the United States  
11       at the San Ysidro, California, Port of Entry carrying four  
12       undocumented aliens concealed in the trunk.
- 13       13. On or about November 6, 2005, defendant JULIE HERNANDEZ  
14       rode as a passenger in a Geo Metro driven from Mexico into  
15       the United States at the San Ysidro, California, Port of  
16       Entry carrying one undocumented alien concealed in a  
17       modified dashboard compartment.
- 18       14. On or about November 12, 2005, defendant JULIE HERNANDEZ  
19       drove a 1993 Chevrolet Geo from Mexico into the United  
20       States at the Otay Mesa, California, Port of Entry carrying  
21       one undocumented alien concealed in a modified dashboard  
22       compartment.
- 23       15. On or about November 22, 2005, Yesenia Garcia-Reyna drove  
24       a Ford Escort from Mexico into the United States at the San  
25       Ysidro, California, Port of Entry carrying one undocumented  
26       alien in the passenger compartment.
- 27       16. On or about December 13, 2005, defendant JULIE HERNANDEZ  
28       drove a Mitsubishi Galant from Mexico into the United

1 States at the San Ysidro, California, Port of Entry  
2 carrying one undocumented alien concealed in a modified  
3 dashboard compartment.

4 17. On or about On January 5, 2006, Reynalda Gonzalez (charged  
5 elsewhere) drove and Amber Ann Varao (charged elsewhere)  
6 rode as a passenger in a Ford Aspire from Mexico into the  
7 United States at the San Ysidro, California, Port of Entry  
8 carrying one undocumented alien concealed under the  
9 driver's seat.

10 18. On or about January 10, 2006, Wesley Dean Hardesty (charged  
11 elsewhere) drove and Amber Ann Varao rode as a passenger in  
12 a Geo Storm from Mexico into the United States at the  
13 San Ysidro, California, Port of Entry carrying one  
14 undocumented alien in the passenger compartment.

15 19. On or about January 17, 2006, Wesley Dean Hardesty drove a  
16 Chevrolet Cavalier from Mexico into the United States at  
17 the San Ysidro, California, Port of Entry carrying one  
18 undocumented alien concealed in the side floorboard.

19 20. On or about January 24, 2006, Wesley Dean Hardesty rode as  
20 a passenger along Highway 188 in a Hyundai Elantra that was  
21 registered to defendant JOSE PARADA-VELAZQUEZ, with a  
22 stated address of defendant MARISELA CASTRO-JUAREZ's home  
23 at 1514 Amador Street in Chula Vista, California, that  
24 contained two undocumented aliens in the passenger  
25 compartment.

26 21. On or about January 31, 2006, Yesenia Garcia-Reyna drove  
27 and Lizbeth Flores (charged elsewhere) rode as a passenger  
28 in a Daewoo Lanos from Mexico into the United States at the

1 San Ysidro, California, Port of Entry carrying one  
2 undocumented alien concealed in a modified dashboard  
3 compartment.

4 22. On or about February 1, 2006, Wesley Dean Hardesty drove a  
5 Pontiac Grand Am from Mexico into the United States at the  
6 San Ysidro, California, Port of Entry carrying three  
7 undocumented aliens concealed in the trunk.

8 23. On or about March 6, 2006, defendant MARISELA CASTRO-JUAREZ  
9 rented a Dodge Caravan.

10 24. On or about March 12, 2006, defendant JOHN WALTER SCHUH  
11 drove a Jeep Liberty near the intersection of Thing Road  
12 and Humphries Road, California, with six undocumented  
13 aliens in the passenger compartment.

14 25. On or about March 21, 2006, defendant LORENZO PECORARO  
15 drove the Dodge Caravan that defendant MARISELA CASTRO-  
16 JUAREZ rented carrying five undocumented aliens in the  
17 passenger compartment.

18 26. On or about March 28, 2006, Ricardo Reyes (charged  
19 elsewhere) picked up two undocumented aliens at the  
20 McDonald's Restaurant, took them to his residence in  
21 San Diego, California, and contacted the aliens' sponsors,  
22 to arrange a meeting at the Denny's Restaurant in San  
23 Clemente, California, where the sponsors would pick up the  
24 aliens.

25 27. On or about March 29, 2006, Ricardo Reyes drove a Ford  
26 Explorer in tandem with a Infiniti J30 driven by Joshua  
27 Roman (charged elsewhere) toward the Interstate 5 Border  
28 Patrol Checkpoint in San Clemente, California.



- 1       28. On or about March 29, 2006, Ricardo Reyes drove the Ford  
2       Explorer to the rest area located at mile marker 59, and  
3       Joshua Roman drove the Infiniti through the San Clemente  
4       checkpoint with the two undocumented aliens in the back  
5       seat of the vehicle.
- 6       29. On or about March 29, 2006, Wesley Dean Hardesty drove a  
7       Ford Aspire to the Interstate 8 Border Patrol checkpoint  
8       carrying an undocumented alien concealed on the floorboard  
9       in the rear of the car.
- 10      30. On or about April 13, 2006, defendant RANDAL MARK PANTER  
11      drove an Infiniti G20T from Mexico into the United States  
12      at the San Ysidro, California, Port of Entry carrying three  
13      undocumented aliens concealed in the trunk.
- 14      31. On or about June 16, 2006, Yesenia Garcia-Reyna drove a  
15      Chrysler PT Cruiser to the State Route 94 Border Patrol  
16      checkpoint carrying two undocumented aliens concealed in  
17      the trunk and one undocumented alien concealed under a  
18      blanket.
- 19      32. On or about July 16, 2006, defendant RANDAL MARK PANTER  
20      drove and Wesley Dean Hardesty rode as a passenger in a  
21      Dodge Neon to the Old Highway 80 Border Patrol checkpoint  
22      near Pine Valley, California carrying two undocumented  
23      aliens concealed in the trunk and one undocumented alien  
24      concealed under a sign behind the rear seat.
- 25      33. On or about August 2, 2006, defendant MARISELA CASTRO-  
26      JUAREZ, drove a Nissan Altima to a meeting with defendant  
27      RANDAL MARK PANTER.
- 28



- 1 34. On or about August 2, 2006, defendant RANDAL MARK PANTER  
2 drove a rented Chrysler 300M to a "Kragen Auto Parts"  
3 store, returned home to his residence where he installed  
4 coil boosters on the suspension of the Chrysler 300M.
- 5 35. On or about August 2, 2006, defendant RANDAL MARK PANTER  
6 and Patricia Prohl (not charged herein) drove the rented  
7 Chrysler 300M to the Old Highway 80 Border Patrol  
8 Checkpoint carrying three undocumented aliens concealed in  
9 the trunk.
- 10 36. On or about August 10, 2006, Yesenia Garcia-Reyna drove and  
11 Lizbeth Flores rode as a passenger in a Ford Escort to the  
12 State Route 94 Border Patrol checkpoint near Jamul,  
13 California carrying two undocumented aliens concealed in  
14 the passenger compartment.
- 15 37. On or about August 14, 2006, defendant RANDAL MARK PANTER  
16 drove defendant MARISELA CASTRO-JUAREZ's white Nissan  
17 Altima, along Old Highway 80, three undocumented aliens  
18 concealed in the trunk.
- 19 38. On or about September 24, 2006, Wesley Dean Hardesty drove  
20 a Dodge Stratus to the State Route 94 Border Patrol  
21 Checkpoint carrying three undocumented aliens concealed in  
22 the trunk.
- 23 39. On or about October 25, 2006, defendant DAVID MONTES drove  
24 a Honda Accord to the Interstate 8 Border Patrol Checkpoint  
25 near Pine Valley, California, carrying two undocumented  
26 aliens concealed in the trunk.
- 27  
28

1           40. On or about January 25, 2007, Wesley Dean Hardesty drove a  
2           Toyota Camry to the State Route 94 Border Patrol Checkpoint  
3           carrying two undocumented aliens concealed in the trunk.

4           41. On or about February 15, 2007, defendant JOSE PARADA-  
5           VELAZQUEZ exited his residence in Chula Vista, California,  
6           and drove a Honda Accord to a gas station, wiped down the  
7           trunk of the car, vacuumed the inside, and then drove to  
8           Melrose Avenue in Chula Vista.

9           42. On or about February 15, 2007, defendant MARISELA CASTRO-  
10          JUAREZ drove and defendant RANDAL MARK PANTER rode as a  
11          passenger in a Toyota Sienna, rented by defendant MARISELA  
12          CASTRO-JUAREZ, to Melrose Avenue and stopped next to the  
13          Honda Accord occupied by defendant JOSE PARADA-VELAZQUEZ.

14          43. On or about February 15, 2007, defendant JOSE PARADA-  
15          VELAZQUEZ exited the Honda Accord and delivered set of keys  
16          to defendant RANDAL MARK PANTER.

17          44. On or about February 15, 2007, defendant MARISELA CASTRO-  
18          JUAREZ drove and defendant JOSE PARADA-VELAZQUEZ rode as a  
19          passenger in a Toyota Sienna away from the meeting at  
20          Melrose Avenue.

21          45. On or about February 15, 2007, defendant RANDAL MARK PANTER  
22          drove the Honda Accord to the State Route 94 Border Patrol  
23          Checkpoint carrying three undocumented aliens concealed in  
24          the trunk.

25          46. On or about March 9, 2007, defendant DAVID MONTES drove and  
26          defendant MARISELA CASTRO-JUAREZ rode as a passenger in a  
27          Chrysler Sebring, that was rented by defendant MARISELA  
28

1 CASTRO-JUAREZ, on East Palomar Street in Chula Vista,  
2 California.

3 47. On or about March 10, 2007, defendant DAVID MONTES drove  
4 the Chrysler Sebring to the State Route 94 Border Patrol  
5 Checkpoint near Dulzura, California, carrying two  
6 undocumented aliens in the passenger compartment.

7 48. On or about August 1, 2007, defendant JOHN WALTER SCHUH  
8 drove a Chevy Malibu to the Interstate 8 United States  
9 Border Patrol Checkpoint carrying two undocumented aliens  
10 concealed in the trunk of the vehicle.

11 49. On or about January 25, 2008, defendant MARISA MELENA  
12 MAFNAS drove a Honda Accord to the Interstate 8 United  
13 States Border Patrol Checkpoint carrying two undocumented  
14 aliens concealed in the trunk of the vehicle.

15 All in violation of Title 18, United States Code, Section 371.

16 Count 2

17 On or about January 9, 2004, within the Southern District of  
18 California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO,  
19 with the intent to violate the immigration laws of the United States,  
20 knowing and in reckless disregard of the fact that an alien, namely,  
21 Luisa Cortes-Matias, had not received prior official authorization to  
22 come to, enter and reside in the United States, did bring to and  
23 attempt to bring to the United States said alien for the purpose of  
24 commercial advantage and private financial gain; in violation of  
25 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
26 United States Code, Section 2.

27 //

28 //

**1**

2

## 12

13

## 23

24

1 come to, enter and reside in the United States, did bring to and  
2 attempt to bring to the United States said alien for the purpose of  
3 commercial advantage and private financial gain; in violation of  
4 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
5 United States Code, Section 2.

6 Count 6

7 On or about May 7, 2004, within the Southern District of  
8 California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO,  
9 with the intent to violate the immigration laws of the United States,  
10 knowing and in reckless disregard of the fact that an alien, namely,  
11 Maria Salas-Carrillo, had not received prior official authorization  
12 to come to, enter and reside in the United States, did bring to and  
13 attempt to bring to the United States said alien for the purpose of  
14 commercial advantage and private financial gain; in violation of  
15 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
16 United States Code, Section 2.

17 Count 7

18 On or about May 7, 2004, within the Southern District of  
19 California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO,  
20 with the intent to violate the immigration laws of the United States,  
21 knowing and in reckless disregard of the fact that an alien, namely,  
22 Alicia Santiago, had not received prior official authorization to come  
23 to, enter and reside in the United States, did bring to and attempt  
24 to bring to the United States said alien for the purpose of commercial  
25 advantage and private financial gain; in violation of Title 8, United  
26 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States  
27 Code, Section 2.

28 //

Count 8

On or about May 7, 2004, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Eduardo Reyes, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 9

On or about September 14, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and MARISA MELENA MAFNAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Carla Chavarin-Carmona, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 10

On or about September 16, 2005, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Marta Munoz-Josefina, had not received prior official authorization to come to,

1 enter and reside in the United States, did bring to and attempt to  
2 bring to the United States said alien for the purpose of commercial  
3 advantage and private financial gain; in violation of Title 8, United  
4 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States  
5 Code, Section 2.

6 Count 11

7 On or about October 3, 2005, within the Southern District of  
8 California, defendant MARISELA CASTRO-JUAREZ, with the intent to  
9 violate the immigration laws of the United States, knowing and in  
10 reckless disregard of the fact that an alien, namely, Evangelina  
11 Alfaro-Garcia, had not received prior official authorization to come  
12 to, enter and reside in the United States, did bring to and attempt  
13 to bring to the United States said alien for the purpose of commercial  
14 advantage and private financial gain; in violation of Title 8, United  
15 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States  
16 Code, Section 2.

17 Count 12

18 On or about October 5, 2005, within the Southern District of  
19 California, defendant MARISELA CASTRO-JUAREZ, with the intent to  
20 violate the immigration laws of the United States, knowing and in  
21 reckless disregard of the fact that an alien, namely, Maribel Rios-  
22 Murrillo, had not received prior official authorization to come to,  
23 enter and reside in the United States, did bring to and attempt to  
24 bring to the United States said alien for the purpose of commercial  
25 advantage and private financial gain; in violation of Title 8, United  
26 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States  
27 Code, Section 2.

28 //



Count 13

On or about November 6, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Guillermina Contreras-Calderon, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 14

On or about November 6, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Dora Nely Beltran-Frias, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 15

On or about November 6, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Erika Vanessa Hernandez-Ramos, had not received prior official

1 authorization to come to, enter and reside in the United States, did  
2 bring to and attempt to bring to the United States said alien for the  
3 purpose of commercial advantage and private financial gain; in  
4 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
5 and Title 18, United States Code, Section 2.

6 Count 16

7 On or about November 6, 2005, within the Southern District of  
8 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,  
9 with the intent to violate the immigration laws of the United States,  
10 knowing and in reckless disregard of the fact that an alien, namely,  
11 Jesus Millan-Hernandez, had not received prior official authorization  
12 to come to, enter and reside in the United States, did bring to and  
13 attempt to bring to the United States said alien for the purpose of  
14 commercial advantage and private financial gain; in violation of  
15 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
16 United States Code, Section 2.

17 Count 17

18 On or about November 6, 2005, within the Southern District of  
19 California, defendants MARISELA CASTRO-JUAREZ and JULIE HERNANDEZ,  
20 with the intent to violate the immigration laws of the United States,  
21 knowing and in reckless disregard of the fact that an alien, namely,  
22 Sergio Hernandez-Mares, had not received prior official authorization  
23 to come to, enter and reside in the United States, did bring to and  
24 attempt to bring to the United States said alien for the purpose of  
25 commercial advantage and private financial gain; in violation of  
26 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
27 United States Code, Section 2.

28 //

Count 18

On or about November 12, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JULIE HERNANDEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Rosalia Rodriguez-Rodriguez, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 19

On or about November 22, 2005, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Isabel Portillo-Aguilar, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 20

On or about December 13, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JULIE HERNANDEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Francisco Zaragoza-Basulto, had not received prior official

1 authorization to come to, enter and reside in the United States, did  
2 bring to and attempt to bring to the United States said alien for the  
3 purpose of commercial advantage and private financial gain; in  
4 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
5 and Title 18, United States Code, Section 2.

6 Count 21

7 On or about January 5, 2006, within the Southern District of  
8 California, defendant MARISELA CASTRO-JUAREZ, with the intent to  
9 violate the immigration laws of the United States, knowing and in  
10 reckless disregard of the fact that an alien, namely, Jaime Lopez-  
11 Hernandez, had not received prior official authorization to come to,  
12 enter and reside in the United States, did bring to and attempt to  
13 bring to the United States said alien for the purpose of commercial  
14 advantage and private financial gain; in violation of Title 8, United  
15 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States  
16 Code, Section 2.

17 Count 22

18 On or about January 10, 2006, within the Southern District of  
19 California, defendant MARISELA CASTRO-JUAREZ, with the intent to  
20 violate the immigration laws of the United States, knowing and in  
21 reckless disregard of the fact that an alien, namely, David Gonzalo  
22 Noriegaj-Velazquez, had not received prior official authorization to  
23 come to, enter and reside in the United States, did bring to and  
24 attempt to bring to the United States said alien for the purpose of  
25 commercial advantage and private financial gain; in violation of  
26 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
27 United States Code, Section 2.

28 //

Count 23

On or about January 17, 2006, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Maria Sandoval-Franco, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 24

On or about January 31, 2006, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Araceli Alonso-Andres, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 25

On or about February 1, 2006, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Artemio Hernandez-Hernandez, had not received prior official authorization to

1 come to, enter and reside in the United States, did bring to and  
2 attempt to bring to the United States said alien for the purpose of  
3 commercial advantage and private financial gain; in violation of  
4 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
5 United States Code, Section 2.

6 Count 26

7 On or about March 12, 2006, within the Southern District of  
8 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,  
9 with the intent to violate the immigration laws of the United States,  
10 knowing and in reckless disregard of the fact that an alien, namely,  
11 Leticia Casillas Sasillas, had come to, entered and remained in the  
12 United States in violation of law, did transport and move and attempt  
13 to transport and move said alien within the United States in  
14 furtherance of such violation of law; in violation of Title 8, United  
15 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

16 Count 27

17 On or about March 12, 2006, within the Southern District of  
18 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,  
19 with the intent to violate the immigration laws of the United States,  
20 knowing and in reckless disregard of the fact that an alien, namely,  
21 Diego Gonzalez-Rojas, had come to, entered and remained in the United  
22 States in violation of law, did transport and move and attempt to  
23 transport and move said alien within the United States in furtherance  
24 of such violation of law; in violation of Title 8, United States Code,  
25 Sections 1324(a)(1)(A)(ii) and (v)(II).

26 //

27 //

28 //

Count 28

On or about March 21, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Arecelia Barroso-Duran, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 29

On or about March 21, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Elena Flores-Cruz, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 30

On or about April 13, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Manuel Cruz-Cruz, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of



1 commercial advantage and private financial gain; in violation of  
2 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
3 United States Code, Section 2.

4 Count 31

5 On or about April 13, 2006, within the Southern District of  
6 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
7 with the intent to violate the immigration laws of the United States,  
8 knowing and in reckless disregard of the fact that an alien, namely,  
9 Gabriel Zapata-Cruz, had not received prior official authorization to  
10 come to, enter and reside in the United States, did bring to and  
11 attempt to bring to the United States said alien for the purpose of  
12 commercial advantage and private financial gain; in violation of  
13 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
14 United States Code, Section 2.

15 Count 32

16 On or about April 13, 2006, within the Southern District of  
17 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
18 with the intent to violate the immigration laws of the United States,  
19 knowing and in reckless disregard of the fact that an alien, namely,  
20 Marcial Santiago-Cruz, had not received prior official authorization  
21 to come to, enter and reside in the United States, did bring to and  
22 attempt to bring to the United States said alien for the purpose of  
23 commercial advantage and private financial gain; in violation of  
24 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
25 United States Code, Section 2.

26 //

27 //

28 //

Count 33

On or about July 16, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jaime Almanza-Tinoco, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 34

On or about July 16, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Sergio Aurelio Aguirre-Tinoco, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 35

On or about July 16, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Juan Sanchez-Cortez, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance

1 of such violation of law; in violation of Title 8, United States Code,  
2 Sections 1324(a)(1)(A)(ii) and (v)(II).

3 Count 36

4 On or about August 2, 2006, within the Southern District of  
5 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
6 with the intent to violate the immigration laws of the United States,  
7 knowing and in reckless disregard of the fact that an alien, namely,  
8 Lorenzo Castillo-Mendez, had come to, entered and remained in the  
9 United States in violation of law, did transport and move and attempt  
10 to transport and move said alien within the United States in  
11 furtherance of such violation of law; in violation of Title 8, United  
12 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

13 Count 37

14 On or about August 2, 2006, within the Southern District of  
15 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
16 with the intent to violate the immigration laws of the United States,  
17 knowing and in reckless disregard of the fact that an alien, namely,  
18 Alfredo Herrera-Hernandez, had come to, entered and remained in the  
19 United States in violation of law, did transport and move and attempt  
20 to transport and move said alien within the United States in  
21 furtherance of such violation of law; in violation of Title 8, United  
22 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

23 Count 38

24 On or about August 2, 2006, within the Southern District of  
25 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
26 with the intent to violate the immigration laws of the United States,  
27 knowing and in reckless disregard of the fact that an alien, namely,  
28 Martin Castillo-Mendez, had come to, entered and remained in the

1 United States in violation of law, did transport and move and attempt  
2 to transport and move said alien within the United States in  
3 furtherance of such violation of law; in violation of Title 8, United  
4 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

5 Count 39

6 On or about August 14, 2006, within the Southern District of  
7 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
8 with the intent to violate the immigration laws of the United States,  
9 knowing and in reckless disregard of the fact that an alien, namely,  
10 Yesica Villa-Garcia, had come to, entered and remained in the United  
11 States in violation of law, did transport and move and attempt to  
12 transport and move said alien within the United States in furtherance  
13 of such violation of law; in violation of Title 8, United States Code,  
14 Sections 1324(a)(1)(A)(ii) and (v)(II).

15 Count 40

16 On or about August 14, 2006, within the Southern District of  
17 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
18 with the intent to violate the immigration laws of the United States,  
19 knowing and in reckless disregard of the fact that an alien, namely,  
20 Daniel Mentencur-Alvarado, had come to, entered and remained in the  
21 United States in violation of law, did transport and move and attempt  
22 to transport and move said alien within the United States in  
23 furtherance of such violation of law; in violation of Title 8, United  
24 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

25 Count 41

26 On or about August 14, 2006, within the Southern District of  
27 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,  
28 with the intent to violate the immigration laws of the United States,

1 knowing and in reckless disregard of the fact that an alien, namely,  
2 Vicente Villa-Marin, had come to, entered and remained in the United  
3 States in violation of law, did transport and move and attempt to  
4 transport and move said alien within the United States in furtherance  
5 of such violation of law; in violation of Title 8, United States Code,  
6 Sections 1324(a)(1)(A)(ii) and (v)(II).

7 Count 42

8 On or about October 25, 2006, within the Southern District of  
9 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with  
10 the intent to violate the immigration laws of the United States,  
11 knowing and in reckless disregard of the fact that an alien, namely,  
12 Jesus Bravo-Rascon, had come to, entered and remained in the United  
13 States in violation of law, did transport and move and attempt to  
14 transport and move said alien within the United States in furtherance  
15 of such violation of law; in violation of Title 8, United States Code,  
16 Sections 1324(a)(1)(A)(ii) and (v)(II).

17 Count 43

18 On or about October 25, 2006, within the Southern District of  
19 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with  
20 the intent to violate the immigration laws of the United States,  
21 knowing and in reckless disregard of the fact that an alien, namely,  
22 Eric Arnoldo Meza-Rodriguez, had come to, entered and remained in the  
23 United States in violation of law, did transport and move and attempt  
24 to transport and move said alien within the United States in  
25 furtherance of such violation of law; in violation of Title 8, United  
26 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

27 //

28 //

Count 44

On or about February 15, 2007, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ, RANDAL MARK PANTER and JOSE PARADA-VELAZQUEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jorge Hernandez-Benitez, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 45

On or about February 15, 2007, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ, RANDAL MARK PANTER and JOSE PARADA-VELAZQUEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Maria Oseguera-Oseguera, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 46

On or about February 15, 2007, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ, RANDAL MARK PANTER and JOSE PARADA-VELAZQUEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Juli Montes-Garcia, had come to, entered and

1 remained in the United States in violation of law, did transport and  
2 move and attempt to transport and move said alien within the United  
3 States in furtherance of such violation of law; in violation of  
4 Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

5 Count 47

6 On or about March 10, 2007, within the Southern District of  
7 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with  
8 the intent to violate the immigration laws of the United States,  
9 knowing and in reckless disregard of the fact that an alien, namely,  
10 Leonardo Perez-Cortez, had come to, entered and remained in the United  
11 States in violation of law, did transport and move and attempt to  
12 transport and move said alien within the United States in furtherance  
13 of such violation of law; in violation of Title 8, United States Code,  
14 Sections 1324(a)(1)(A)(ii) and (v)(II).

15 Count 48

16 On or about March 10, 2007, within the Southern District of  
17 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with  
18 the intent to violate the immigration laws of the United States,  
19 knowing and in reckless disregard of the fact that an alien, namely,  
20 Erendia Lopez-Cruz, had come to, entered and remained in the United  
21 States in violation of law, did transport and move and attempt to  
22 transport and move said alien within the United States in furtherance  
23 of such violation of law; in violation of Title 8, United States Code,  
24 Sections 1324(a)(1)(A)(ii) and (v)(II).

25 Count 49

26 On or about August 1, 2007, within the Southern District of  
27 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,  
28 with the intent to violate the immigration laws of the United States,



1 knowing and in reckless disregard of the fact that an alien, namely,  
2 Elizabeth Zamora-Perez, had come to, entered and remained in the  
3 United States in violation of law, did transport and move and attempt  
4 to transport and move said alien within the United States in  
5 furtherance of such violation of law; in violation of Title 8, United  
6 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

7 Count 50

8 On or about August 1, 2007, within the Southern District of  
9 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,  
10 with the intent to violate the immigration laws of the United States,  
11 knowing and in reckless disregard of the fact that an alien, namely,  
12 Pedro Ruiz-Silva, had come to, entered and remained in the United  
13 States in violation of law, did transport and move and attempt to  
14 transport and move said alien within the United States in furtherance  
15 of such violation of law; in violation of Title 8, United States Code,  
16 Sections 1324(a)(1)(A)(ii) and (v)(II).

17 Count 51

18 On or about January 25, 2008 within the Southern District of  
19 California, defendants MARISELA CASTRO-JUAREZ and MARISA MELENA  
20 MAFNAS, with the intent to violate the immigration laws of the United  
21 States, knowing and in reckless disregard of the fact that an alien,  
22 namely, Teresa Hernandez Samano, had come to, entered and remained in  
23 the United States in violation of law, did transport and move and  
24 attempt to transport and move said alien within the United States in  
25 furtherance of such violation of law; in violation of Title 8, United  
26 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

27 //

28 //

Count 52

On or about January 25, 2008 within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and MARISA MELENA MAFNAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jose Hernandez Samano, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 53

(Engaging in Monetary Transactions in Property  
Derived from Specified Unlawful Activity)

On or about August 28, 2003, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and attempt to engage in a monetary transaction by, through, or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit of funds in the amount of a \$44,300 cashier's check number 2015371513, payable to defendant MARISELA CASTRO-JUAREZ, into Bank of America account no. xxxxxx7755, such property having been derived from a specified unlawful activity, that is a violation of Title 8, United States Code, Section 1324(a) (bringing in, transporting, or harboring illegal aliens, or conspiracy to commit such offense); in violation of Title 18, United States Code, Section 1957, and Section 2.

//

//

//

1

2

3

## 16

17

18

1 (bringing in, transporting, or harboring illegal aliens, or conspiracy  
2 to commit such offense); in violation of Title 18, United States Code,  
3 Section 1957, and Section 2.

4 Count 56

5 (Engaging in Monetary Transactions in Property  
6 Derived from Specified Unlawful Activity)

7 On or about May 20, 2004, within the Southern District of  
8 California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and  
9 attempt to engage in a monetary transaction by, through, or to a  
10 financial institution, affecting interstate and foreign commerce, in  
11 criminally derived property of a value greater than \$10,000, that is  
12 the payment of a \$20,000 Bank of America cashier's check  
13 number 2017177948 to McMillin Escrow, such property having been  
14 derived from a specified unlawful activity, that is a violation of  
15 Title 8, United States Code, Section 1324(a) (bringing in,  
16 transporting, or harboring illegal aliens, or conspiracy to commit  
17 such offense); in violation of Title 18, United States Code,  
18 Section 1957, and Section 2.

19 Count 57

20 (Engaging in Monetary Transactions in Property  
21 Derived from Specified Unlawful Activity)

22 On or about July 19, 2004, within the Southern District of  
23 California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and  
24 attempt to engage in a monetary transaction by, through, or to a  
25 financial institution, affecting interstate and foreign commerce, in  
26 criminally derived property of a value greater than \$10,000, that is  
27 the deposit of funds in the amount of \$16,000 into Bank of America  
28 account no. xxxxxx7755, such property having been derived from a

1 specified unlawful activity, that is a violation of Title 8, United  
2 States Code, Section 1324(a) (bringing in, transporting, or harboring  
3 illegal aliens, or conspiracy to commit such offense); in violation  
4 of Title 18, United States Code, Section 1957, and Section 2.

5 Count 58

6 (Engaging in Monetary Transactions in Property  
7 Derived from Specified Unlawful Activity)

8 On or about July 12, 2006, within the Southern District of  
9 California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and  
10 attempt to engage in a monetary transaction by, through, or to a  
11 financial institution, affecting interstate and foreign commerce, in  
12 criminally derived property of a value greater than \$10,000, that is  
13 the withdrawal of funds in the amount of \$10,500 from Bank of America  
14 account no. xxxxxx7755, such property having been derived from a  
15 specified unlawful activity, that is a violation of Title 8, United  
16 States Code, Section 1324(a) (bringing in, transporting, or harboring  
17 illegal aliens, or conspiracy to commit such offense); in violation  
18 of Title 18, United States Code, Section 1957, and Section 2.

19 Counts 59-77

20 (Laundering of Monetary Instruments)

21 On or about the dates listed in the chart below, within the  
22 Southern District of California, defendant MARISELA CASTRO-JUAREZ, did  
23 knowingly conduct and attempt to conduct the financial transactions  
24 listed in the chart below, affecting interstate and foreign commerce,  
25 which involved the proceeds of a specified unlawful activity, that is  
26 a violation of Title 8, United States Code, Section 1324(a) (bringing  
27 in, transporting, or harboring illegal aliens, or conspiracy to commit  
28 such offense), knowing that the transaction was designed in whole and

in part to avoid a transaction reporting requirement under Federal law, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions, that is funds in the amounts listed in the chart below, represented the proceeds of some form of unlawful activity:

COUNT	DATE	TRANSACTION
59	5/21/2003	Deposit of \$9,950 cash into Bank of America account no. xxxxxx7755.
60	9/23/2003	Withdrawal of \$5,000 cash from Bank of America account no. xxxxxx7755.
61	9/24/2003	Withdrawal of \$9,000 cash from Bank of America account no. xxxxxx7755.
62	11/24/2003	Withdrawal of \$9,500 cash from Bank of America account no. xxxxxx7755.
63	3/15/2004	Deposit of \$9,900 cash into Bank of America account no. xxxxxx7755.
64	4/7/2004	Deposit of \$9,900 cash into Bank of America account no. xxxxxx7755.
65	7/30/2004	Deposit of \$9,900 cash into Bank of America account no. xxxxxx7755.
66	1/13/2005	Deposit of \$9,000 cash into Bank of America account no. xxxxxx7755.
67	1/18/2005	Deposit of \$1,900 cash into Bank of America account no. xxxxxx7755.
68	2/14/2005	Deposit of \$9,950 cash into Bank of America account no. xxxxxx7755.
69	2/24/2005	Deposit of \$4,000 cash into Bank of America account no. xxxxxx7755.
70	11/3/2005	Deposit of \$4,500 cash into Bank of America account no. xxxxxx7755.
71	11/7/2005	Deposit of \$6,500 cash into Bank of America account no. xxxxxx7755.
72	11/29/2005	Deposit of \$7,500 cash into Bank of America account no. xxxxxx7755.

<u>COUNT</u>	<u>DATE</u>	<u>TRANSACTION</u>
73	11/29/2005	Deposit of \$6,700 cash into Bank of America account no. xxxxxx7755.
74	12/8/2005	Deposit of \$9,300 cash into Bank of America account no. xxxxxx7755.
75	12/12/2005	Deposit of \$2,000 cash into Bank of America account no. xxxxxx7755.
76	2/21/2006	Deposit of \$5,500 cash into Bank of America account no. xxxxxx7755.
77	2/28/2006	Deposit of \$4,500 cash into Bank of America account no. xxxxxx7755.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii), and Section 2.

#### FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 through 52 of this Indictment are realleged and by their reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982(a)(6).

2. Upon conviction of one or more of the offenses alleged in Counts 1 through 52, which involve violations of Title 8, United States Code, Section 1324(a), and pursuant to Title 18, United States Code, Section 982(a)(6), defendants MARISELA CASTRO-JUAREZ; DAVID MONTES; JULIE HERNANDEZ; RANDAL MARK PANTER; MARISA MELENA MAFNAS; LORENZO PECORARO; JOSE PARADA-VELAZQUEZ; and JOHN WALTER SCHUH, shall forfeit to the United States all their rights, title and interest in the following: (a) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the defendant is convicted; (b) any property real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or



1 indirectly from the commission of the offense of which the defendant  
2 is convicted; and (c) any property real or personal, that is used to  
3 facilitate, and is intended to be used to facilitate, the commission  
4 of the offense of which the defendant is convicted; this property  
5 includes but is not limited to the following:

6           a.    A sum of money equal to, but not limited to, at least  
7                   \$598,775.00 in United States currency, representing  
8                   the amount of proceeds obtained as a result of the  
9                   violation of Title 8, United States Code,  
10                  Section 1324(a), for which defendants MARISELA CASTRO-  
11                  JUAREZ; DAVID MONTES; JULIE HERNANDEZ; RANDAL MARK  
12                  PANTER; MARISA MELENA MAFNAS; LORENZO PECORARO; JOSE  
13                  PARADA-VELAZQUEZ; and JOHN WALTER SCHUH are jointly  
14                  and severally liable.

15           b.    All that lot of parcel of land, together with its  
16                  buildings, appurtenances, improvements, fixtures,  
17                  attachments, and easements, located at 1514 Amador  
18                  Street, Chula Vista, California, more particularly  
19                  described as:

20                       **Lot 41 of Chula Vista Tract No. 96-04, Otay Ranch**  
21                       **Village 1 Neighborhood R-8, according to map**  
22                       **thereof no. 13761, filed in the Office of the**  
23                       **County Recorder of San Diego County on April 16,**  
24                       **1999 as instrument no. 99-257169 of official**  
25                       **records.**

26           3    The allegations contained in Counts 53 through 77 are  
27                  realleged and by reference fully incorporated herein for the purpose  
28                  of alleging forfeiture to the United States of America.

4. Upon conviction of the offenses alleged in Counts 53 through 77, defendant MARISELA CASTRO-JUAREZ shall forfeit to the United States all property, real and personal, involved in said offense and all property traceable to such property, including but not limited to,

5. If any of the forfeitable property described above in Paragraphs 2 and 4, as a result of any act or omission of the defendant -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above in Paragraph 2.

All pursuant to Title 18, United States Code, Section 982(a).

DATED: March 7, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT  
United States Attorney

By: Steve Miller  
STEVE MILLER  
Assistant U.S. Attorney